

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOHN AND JANE DOE NO. 1, *et al.*,)
Plaintiffs,)
v.) Case No. 3:22-cv-00337
BETHEL LOCAL SCHOOL DISTRICT)
BOARD OF EDUCATION, *et al.*,) Judge: Michael J. Newman
Defendants.)
)

**SUPPLEMENTAL DECLARATION OF
DEFENDANT-INTERVENOR ANNE ROE**

I, Anne Roe, declare as follows:

1. I have personal knowledge of the matters stated in this declaration, which I submit in further opposition to Plaintiffs' Motion for Preliminary Injunction in the above-captioned matter.
2. I am aware that statements have been submitted in this case stating or suggesting that I engaged in oral sex in a school restroom stall with another student, on one or more occasions. That accusation is false.
3. I have never had oral sex, or engaged in any other sexual activity, in a school restroom. To make it absolutely clear, I did not engage in any sexual activity—including engaging in oral sex—with any other student in a stall in the girls' communal restroom located near the cafeteria of Bethel High School on January 12, 2023, or on any other date.
4. To my best recollection, on January 12, 2023, I believe I did enter and use the girls' communal restroom located near the cafeteria of Bethel High School.

5. At that time, I was accompanied by my close friend and fellow student, and after entering the restroom we each entered into separate and adjacent restroom stalls.

6. At no point did we enter the same bathroom stall.

7. At no point did we engage in any sexual conduct.

8. While I was in the stall, I heard a number of other students speaking with one another.

9. At some point, one of those students said loudly, "there's a transgender in the bathroom," or something to that effect.

10. The students continued to speak loudly with one another.

11. Once my friend and I both finished using the restroom, we washed our hands and exited the restroom.

12. To my best recollection, it was later that day when one of my classmates told me that they had heard a rumor that I had engaged in inappropriate activity in a school restroom stall.

13. I was upset and worried about this rumor, so I went to speak with the school guidance counselor about it. The counselor told me that if it wasn't true, I shouldn't worry about it. I knew it wasn't true, so there was nothing else I felt I could do.

14. While attending Bethel High School as a student, I am aware that I have been the subject of a number of rumors that are untrue.

15. Rumors like this can be deeply hurtful and humiliating. It's always very upsetting to hear that people are saying things about me that are not true, but it's even worse to hear that something graphic or sexual like this is being said about me.

16. Usually, rumors in high school die down after a few days. I had thought that is what happened with this rumor. I was shocked to hear that people were repeating it in this case.

17. I feel exhausted and overwhelmed that people, including adults who do not even attend Bethel High School, are spreading lies about me and saying things that have the potential to impact my future.

18. Pretty quickly after I got involved in this court case, I remember hearing people at school talking about the case. To my best recollection, the case was discussed on or around January 12, 2023 in a school club meeting that I was attending, but I didn't say anything about it.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Feb/13 2023

Anne Roe

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